

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

STATE OF TEXAS,
STATE OF MISSOURI,

Plaintiffs,

V.

JOSEPH R. BIDEN, JR.,
in his official capacity as
President of the United States, *et al.*,

Civil Action No. 2:21-cv-00067-Z

DECLARATION OF JULIANA BLACKWELL

I, Juliana Blackwell, pursuant to 28 U.S.C. § 1746, and based upon my personal knowledge, and documents and information made known or available to me from official records and reasonably relied upon in the course of my employment, hereby declare as follows:

1. I am employed with the U.S. Department of Homeland Security, as the Deputy Executive Secretary. I am responsible for the oversight and management of the Office of the Executive Secretary, which oversees the management of written communication intended for, and originated by, the Secretary and Deputy Secretary of Homeland Security and maintains official Department records. I have held this position since August 2019. I certified the Administrative Record for this case on June 22, 2021.

2. In June of 2021 when the documents for the Administrative Record submitted in this case were collected, the *Assessment of the Migrant Protection Protocols (MPP)*, October 28, 2019

was included in those documents. However, it was mistakenly not included in the final Administrative Record.

3. On or about July 15, 2021, it was brought to my attention that the administrative record erroneously omitted the final version of the *Assessment of the Migrant Protection Protocols (MPP)*. Until this was brought to my attention, I did not realize that the administrative record needed correction.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief. Executed on this 19th day of July 2021

JULIANA J
BLACKWELL

Digitally signed by
JULIANA J BLACKWELL
Date: 2021.07.19
17:14:50 -04'00'

Juliana Blackwell
Deputy Executive Secretary